

1 The Honorable Christopher M. Alston  
2 Chapter 7  
3  
4

5 UNITED STATES BANKRUPTCY COURT  
6 WESTERN DISTRICT OF WASHINGTON

7 In Re:

8 Catherine Dawn Kroesser  
9 Debtor.  
10  
11

Case No.: 18-14780-CMA

Chapter 7

DECLARATION IN SUPPORT OF  
MOTION FOR RELIEF FROM STAY

12 Under penalty of perjury, the undersigned hereby declares as follows:

- 13 1. As to the following facts, I know them to be true of my own personal knowledge, based  
14 upon the review of the business records, and if called upon to testify in this action, I  
15 could and would testify competently thereto.  
16  
17 2. The real property involved in this motion is commonly known as 1531 Thompson Dr,  
18 Bremerton, WA 98337 (the "Property").  
19  
20 3. I am an employee of Nationstar Mortgage LLC d/b/a Mr. Cooper ("Movant"). I am duly  
21 authorized to make this declaration on behalf of Movant.  
22  
23 4. I am familiar with the manner and procedure by which the records of Movant are  
24 obtained, prepared, and maintained. Those records are obtained, prepared, and  
25 maintained by employees or agents of Movant in the performance of their regular  
26 business duties at or near the time, act, conditions, or events recorded thereon. The  
27 records are made either by persons with knowledge of the matters they record or from  
28 information obtained by persons with such knowledge. I have knowledge of and/or  
29  
30

1 access to the business records. I personally reviewed the business records related to this  
2 loan prior to executing this declaration.

3 5. Movant is, either directly or through the use of a designated custodian, in possession of  
4 the original Promissory Note dated February 15, 2007, in the principal amount of  
5 \$250,500.00, which is secured by a Deed of Trust encumbering the Property. The Note  
6 has not been subsequently assigned or transferred to any other person or entity since  
7 assignment and transfer to Movant. Movant is entitled to receive payments under the  
8 Note and Deed of Trust.  
9

10 6. Attached are redacted copies of any documents that support the claim, such as  
11 promissory notes, purchase order, invoices, itemized statements of running accounts,  
12 contracts, judgments, mortgages, and security agreements in support of right to seek a  
13 lift of the automatic stay and foreclose if necessary.  
14

15 7. The following documents evidencing the loan, including the Note and Deed of Trust, are  
16 attached as Exhibits hereto. Attached as Exhibit 1 is an imaged copy of Movant's file  
17 copy of the Promissory Note.  
18

19 a. Exhibit 1 - Note.  
20

21 b. Exhibit 2 - Deed of Trust.  
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23 c. Exhibit 3 - Assignment of Deed of Trust.  
24

25 8. Movant uses the standard practices of the mortgage lender industry. A payment  
26 received is applied to the account and credited to the next due payment. For example, a  
27 payment received in December will be applied to the November payment if no payment  
28 had been received in November.  
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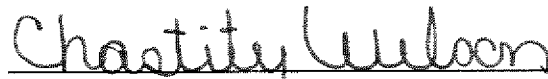
1 9. As of December 21, 2018, Movant's records on the loan that is the subject of this motion  
2 shows that the loan is due for the payments owed on and after July 1, 2018. July 2018  
3 through December 2018 monthly mortgage payments of \$2,364.31 each.

4 10. As of December 21, 2018, the principal balance on the loan is \$239,252.34 and the  
5 approximate total balance due is \$249,315.80.  
6

7 I declare on penalty of perjury under the laws of the United States of America that the  
8 foregoing is true and correct.  
9

10 Executed on January 4, 2019 at Lewisville, Texas.

11 W. DECLARATION/PHOTO

12  
13 

14 Signature

Chastity Wilson

Assistant Secretary of

15 Printed Name

Nationstar Mortgage LLC

able Mr. Cooper

Assistant

16 Title  
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